

ORIGINAL

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Attorneys for Defendant  
 PFIZER, INC.

FILED  
 06 DEC -8 AM 11:54  
 CLERK, U.S. DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

PDL

DEPUTY

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

FERNANDO OBLITAS-RIOS, on behalf  
 of himself and all others similarly situated,

Plaintiff,

v.

PFIZER, INC., a California Corporation;  
 and DOES 1 - 100, inclusive,

Defendant.

Case No. **06 CV 2679 BTM** **POR**

**DECLARATION OF JEREMY A. ROTH  
 REGARDING NOTICE TO STATE COURT  
 OF REMOVING OF CIVIL ACTION TO  
 FEDERAL COURT**

Complaint filed: November 1, 2006

I, Jeremy A. Roth, declare under penalty of perjury as follows:

1. I am an attorney admitted before the courts of this State and am an attorney with the law firm of Littler Mendelson, a Professional Corporation, counsel of record for Defendant PFIZER, INC. ("Defendant") in the above-captioned matter. I have personal knowledge of the facts set forth herein and if called as a witness I could and would competently testify thereto under oath.

2. On December 8, 2006, pursuant to 28 U.S.C. §§ 1331, 1332, 1441 and 1446, I caused to be filed with the Clerk of the Superior Court of the State of California for the County of San Diego a Notice to State Court And All Adverse Parties of Removal of Civil Action, together with a copy of the Notice to Federal Court of Removal of Civil Action. A copy of the Notice to State Court, without its accompanying exhibits, is attached hereto as Exhibit "A." The Notice to Federal Court of Removal of Civil Action served on the Clerk was filed with the United States

DECLARATION OF JEREMY A. ROTH

Case No. \_\_\_\_\_

1 District Court for the Southern District of California on December 8, 2006.

2 I declare under penalty of perjury under the laws of the State of California that the  
3 foregoing is true and correct.

4 Executed this 8 day of December, 2006 at San Diego, California.

5  
6   
7 JEREMY A. ROTH

8  
9  
10 Firmwide: 81730151.1 051034.1019



JEREMY A. ROTH, Bar No. 129007  
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Attorneys for Defendant  
PFIZER, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO

FERNANDO OBLITAS-RIOS, on behalf  
of himself and all others similarly situated,

Plaintiff,

v.

PFIZER, INC., a California Corporation;  
and DOES 1 - 100, inclusive,

Defendant.

Case No. GIC 874925

**NOTICE TO STATE COURT AND ALL  
ADVERSE PARTIES OF REMOVAL OF  
CIVIL ACTION**

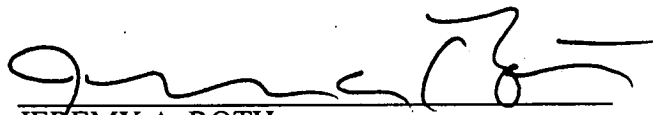
Complaint filed: November 1, 2006

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT AND TO PLAINTIFF AND HIS  
2 ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE THAT Defendant PFIZER, INC. filed on December 8,  
4 2006, its Notice to Federal Court of Removal of Civil Action in the office of the Clerk of the United  
5 States District Court for the Southern District of California pursuant to 28 U.S.C. sections 1331,  
6 1332, 1441 and 1446. Copies of said notice and its accompanying exhibits are attached hereto as  
7 Exhibit "1."

8 PLEASE TAKE FURTHER NOTICE THAT the filing of said notice in Federal  
9 Court, together with the filing of a copy of said notice with this Court, effects the removal of this  
10 action in accordance with 28 U.S.C. section 1446(d).

11 Dated: December 8, 2006



JEREMY A. ROTH  
TINA M. FRYAR  
MICHELLE S. PARK  
LITTLER MENDELSON  
A Professional Corporation  
Attorneys for Defendant  
PFIZER, INC.